

PETITION FOR ZONING VARIANCE

TO THE ZONING COMMISSIONER OF BALTIMORE COUNTY:

The undersigned, legal owner(s) of the property situate in Baltimore County and which is described in the description and plat attached hereto and nad part hereof, hereby petition for a Variance from Section 233.1 to permit a 0' front setback in lieu of the required 15', and to permit a 35' setback from the centerline of Joppa Road in lieu of the required 40'.

of the Zoning Regulations of Baltimore County, to the Zoning Law of Baltimore County; for the following reasons: (Indicate hardship or practical difficulty)

The adopted plan for Towson Town Center advocates high-intensity high-rise buildings. Absent provision of public parking east of York Road, the plan's desired intensity is limited by the need to provide required parking on-site. The requested variance will apply only to below grade parking not visible from Joppa Road and will enable compliance with parking standards. Applying BM setback standards for below grade portions of the proposed structure creates conditions of practical difficulty and unreasonable hardship in as much as all at grade or above grade portions which are visible will be in compliance.

Property is to be posted and advertised as prescribed by Zoning Regulations.

I, or we, agree to pay expenses of above Variance advertising, posting, etc., upon filing of this petition, and further agree to and are to be bound by the zoning regulations and restrictions of Baltimore County adopted pursuant to the Zoning Law For Baltimore County.

I/We do solemnly declare and affirm, under the penalties of perjury, that I/we are the legal owner(s) of the property which is the subject of this Petition.

Contract Purchaser: 204 East Joppa Road, Towson, Maryland 21204
 Legal Owner(s): George B. Stump, 204 East Joppa Road, Towson, Maryland 21204
 Signature: [Signature]
 Signature: [Signature]
 Address: 204 East Joppa Road, Towson, Maryland 21204
 Name, address and phone number of legal owner, contract purchaser or representative to be contacted: Daft-McCune-Walker, Inc., 530 East Joppa Road, Towson, MD 21204, Phone No. 296-3333
 City and State: Towson, Maryland 21204
 Attorney's Telephone No.: 296-3333
 Address: 530 East Joppa Road, Towson, MD 21204, Phone No. 296-3333

ORDERED By The Zoning Commissioner of Baltimore County, this 12th day of October, 1984, that the subject matter of this petition be advertised, as required by the Zoning Law of Baltimore County, in two newspapers of general circulation throughout Baltimore County, that property be posted, and that the public hearing be had before the Zoning Commissioner of Baltimore County in Room 106, County Office Building in Towson, Baltimore County, on the 15th day of October, 1984, at 10:45 o'clock a.m.

Zoning Commissioner of Baltimore County.

(over)



HARRY J. PISTEL, P.E.
DIRECTOR

August 3, 1984

Mr. Arnold Jablon
Zoning Commissioner
County Office Building
Towson, Maryland 21204

Re: Item #14 (1984-1985)
 Property Owner: George B. Stump
 5/25 Joppa Rd., 281.12' E. of Virginia Ave.
 Acres: 0.849
 District: 9th

Dear Mr. Jablon:

The following comments are furnished in regard to the subject item.

GENERAL COMMENTS:

There was no plan submitted for this item; however, this site is being processed as a County Review Group project known as the Jadco Office Building, Project No. 84156. Comments prepared for the County Review Group meeting, dated July 17, 1984 are applicable to this item.

Very truly yours,

GILBERT S. BENSON, P.E., East, Chief
Bureau of Public Services

GSB:EAM:REC:iss

RE: PETITION FOR VARIANCES : BEFORE THE ZONING COMMISSIONER
 S/S of Joppa Rd., 281.12' E of : OF BALTIMORE COUNTY
 Virginia Ave. (203 E. Joppa Rd.): 9th District

GEORGE B. STUMPP, Petitioner : Case No. 85-99-A

ENTRY OF APPEARANCE

Please enter the appearance of the People's Counsel in the above-captioned matter. Notices could be sent of any hearing dates or other proceedings in this matter and of the passage of any preliminary or final Order.

Phyllis Cole Friedman
Phyllis Cole Friedman
People's Counsel for Baltimore County

Peter Max Zimmerman
Peter Max Zimmerman
Deputy People's Counsel
Rm. 223, Court House
Towson, MD 21204
494-2188

I HEREBY CERTIFY that on this 25th day of September, 1984, a copy of the foregoing Entry of Appearance was mailed to Mr. George B. Stump, 204 E. Joppa Rd., Towson, MD 21204, Petitioner; 203 East Joint Venture, 115 East Joppa Rd., Towson, MD 21204, Contract Purchaser; and Daft-McCune-Walker, Inc., 530 E. Joppa Road, Towson, MD 21204, which requested notification.

Peter Max Zimmerman
Peter Max Zimmerman

BALTIMORE COUNTY

ZONING PLANS

ADVISORY COMMITTEE



PETITION AND SITE PLAN

EVALUATION COMMENTS

RECORDED

BALTIMORE COUNTY ZONING PLANS ADVISORY COMMITTEE

October 8, 1984

COUNTY OFFICE BLDG.
111 W. Chesapeake Ave.
Towson, Maryland 21204

Mr. George B. Stump
204 East Joppa Road
Towson, Maryland 21204

Dear Mr. Stump:

The Zoning Plans Advisory Committee and the County Review Group (CRG) have both reviewed the plans submitted with the above referenced petition. The following comments from the CRG have been substituted for those of the Zoning Plans Advisory Committee. They are not intended to indicate the appropriateness of the zoning action requested, but to assure that all parties are made aware of plans or problems with regard to the development plans that may have a bearing on this case. The Director of Planning may file a written report with the Zoning Commissioner with recommendations as to the suitability of the requested zoning.

This petition was accepted for filing on the date of the enclosed filing certificate and a hearing scheduled accordingly.

RE: Case No. 85-99-A (Item No. 11)
 Petitioner - George B. Stump
 Variance Petition

Very truly yours,

NICHOLAS B. COMMODORE
Chairman
Zoning Plans Advisory Committee

Enclosures

cc: Daft-McCune-Walker, Inc.
 530 East Joppa Road
 Towson, Maryland 21204



BALTIMORE COUNTY
DEPARTMENT OF TRAFFIC ENGINEERING
TOWSON, MARYLAND 21204
494-3550

STEPHEN E. COLLINS
DIRECTOR

July 23, 1984

Mr. Arnold Jablon
Zoning Commissioner
County Office Building
Towson, Maryland 21204

Item No. 14 -ZAC- Meeting of July 24, 1984
 Property Owner: George B. Stump
 Location: S/S E. Joppa Road 281.12' E. of Virginia Avenue
 Existing Zoning: B.M.-CT
 Proposed Zoning: Variance to permit a front yard setback of 0' in lieu of the required 15' and to permit a 35' setback from the c/l of Joppa Road in lieu of the required 40'.

Acres: 0.849
 District: 9th

Dear Mr. Jablon:

The Department of Traffic Engineering has not received plans for item number 14.

Michael S. Flanagan
Traffic Engineering Assoc. II

MSF/can



BALTIMORE COUNTY
DEPARTMENT OF PERMITS & LICENSES
TOWSON, MARYLAND 21204
494-3000

July 30, 1984

Mr. Arnold Jablon, Zoning Commissioner
 Office of Planning and Zoning
 County Office Building
 Towson, Maryland 21204

Dear Mr. Jablon:

Comments on Item #14, Zoning Advisory Committee Meeting are as follows:

Property Owner: George B. Stump
 Location: S/S E. Joppa Road 281.12' E. of Virginia Avenue
 Existing Zoning: B.M.-CT
 Proposed Zoning: Variance to permit a front yard setback of 0' in lieu of the required 15' and to permit a 35' setback from the c/l of Joppa Road in lieu of the required 40'.

Acres: 0.849
 District: 9th

The items checked below are applicable:

X A. All structures shall conform to the Baltimore County Building Code 190/Council Bill 4-82 State of Maryland Code for the Handicapped and Aged; and other applicable Codes.

X B. A building permit shall be required before beginning construction.

C. Residential: Three sets of construction drawings are required to file a permit application. Architect/Engineer seal is not required. Non-reproduced seals and signatures are required on Plans and Technical Data.

X D. Commercial: Three sets of construction drawings with a Maryland Registered Architect or Engineer shall be required to file a permit application.

X E. An exterior wall erected within 6'0" for Commercial uses or 3'0" for One and Two Family use group on an adjacent lot line shall be of one hour fire resistive construction, no openings permitted within 3'0" of lot lines. A firewall is required if construction is on the lot line, see Table 1-1, line 2, Section 1407 and Table 1402, also Section 201-2.

F. Requested variance appears to conflict with the Baltimore County Building Code, Section/s

G. A change of occupancy shall be applied for, along with an alteration permit application, and three required sets of drawings indicating how the structure will meet the Code requirements for the proposed change. Drawings may require a professional seal.

H. Before this office can comment on the above structure, please have the owner, then the services of a Registered Architect or Engineer certify to this office, that, the structure for which a proposed change in use is proposed can comply with the height/area requirements of Table 505 and the required construction classification of Table 1401.

I. Comments See the attached sheet for comments that may be applicable.

NOTES: These comments reflect only on the information provided by the drawings submitted to the office of Planning and Zoning and are not intended to be construed as the full extent of any permit. If desired, additional information may be obtained by visiting Room 122 (Plans Section) at 111 W. Chesapeake Ave., Towson.

Very truly yours,

Charles E. Burbanck, Chief
Plans Review

CEB:iss



BALTIMORE COUNTY
OFFICE OF PLANNING AND ZONING
TOWSON, MARYLAND 21204
494-3000

NORMAN E. GERDER
DIRECTOR

Mr. Arnold Jablon
Zoning Commissioner
County Office Building
Towson, Maryland 21204

Dear Mr. Jablon:

The Division of Current Planning and Development has reviewed the subject petition and offers the following comments. The items checked below are applicable.

- () There are no site planning factors requiring comment.
- (X) A County Review Group Meeting is required.
- (X) A County Review Group Meeting was held and the minutes will be forwarded by the Bureau of Public Services.
- () This site is part of a larger tract; therefore it is defined as a subdivision. The plan must show the entire tract.
- () A record plat will be required and must be recorded prior to issuance of a building permit.
- () The access is not satisfactory.
- () The circulation on this site is not satisfactory.
- () The parking arrangement is not satisfactory.
- () Parking calculations must be shown on the plan.
- () This property contains soils which are defined as wetlands, and development on these soils is prohibited.
- () Construction in or alteration of the floodplain is prohibited under the provisions of Section 22-38 of the Development Regulations.
- () Development of this site may constitute a potential conflict with the Baltimore County Master Plan.
- () The amended Development Plan was approved by the Planning Board on
- () Landscaping should be provided on this site and shown on the plan.
- () The property is located in a deficient service area as defined by Bill 178-79. No building permit may be issued until a Reserve Capacity Use Certificate has been issued. The deficient service is
- () The property is located in a traffic area controlled by a "D" level intersection as defined by Bill 178-79, and as conditions change traffic capacity may become more limited. The Basic Services Areas are re-evaluated annually by the County Council.
- (X) Additional comments:

Plan approved by CRG on 7/18/84

Eugene A. Rober
Chief, Current Planning and Development

cc: James Roswell

SHELL BUILDING

200 EAST JOPPA ROAD ASSOCIATES
0355/705
OFFICE, PARKING

HAMPTON HOUSE JOINT VENTURE
1453/1515
APARTMENTS

Joppa

Road

EX.F.H.

PROPOSED
S.WATER
PROPOSED
S.GAL.
EX. CURB & CUTTER
EX. SIDEWALK

PUMP ISLAND

N 39,000
E 4,600

JOSEF & ANNE GERING
4784/0269
LEASE TO EXXON STATION

MARGARET SKIDMORE
1400/471

15TH BRICK
GARAGE

15TH BRICK
RESIDENCE

REAR YARD

EDGE OF BUILDING

EDGE OF TOWER

EX. 1 STY. FRAME BLDG.
TO BE REMOVED

EXISTING
RESIDENT RESIDENCE
TO BE REMOVED

EDGE OF TOWER

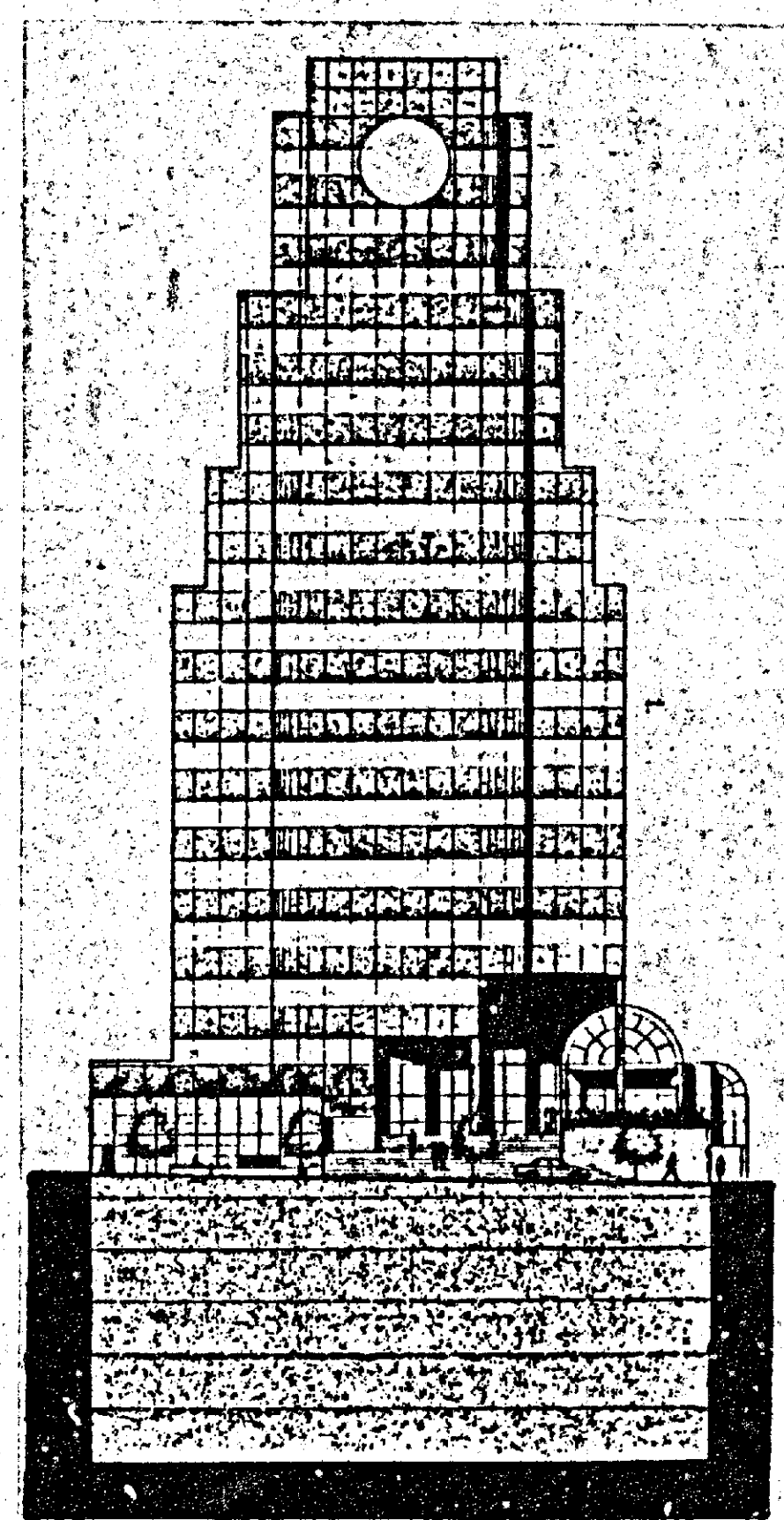
EDGE OF BUILDING

TOWSON CENTER
CONDOMINIUM
FLAT 04/118

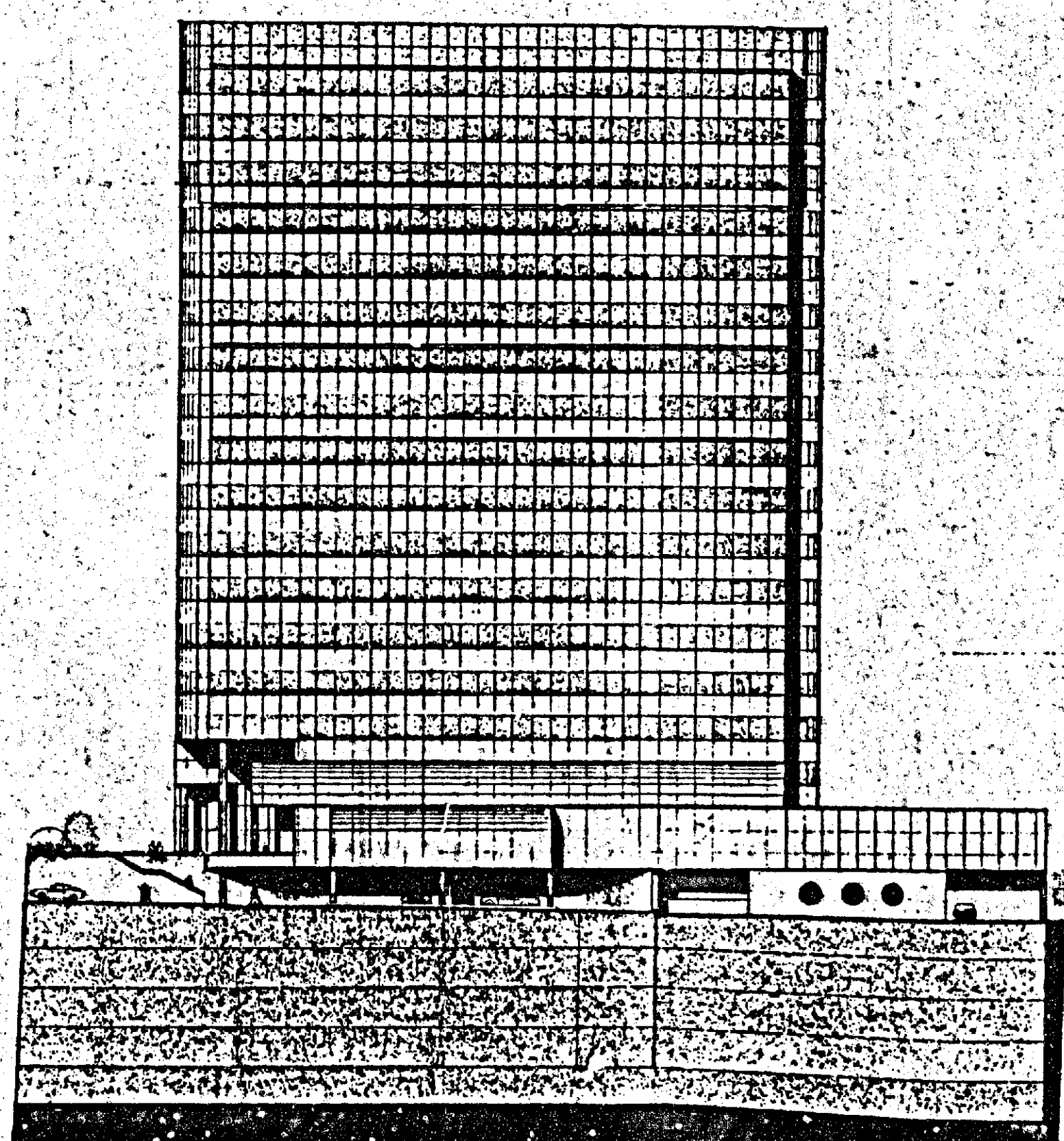
EX.F.H.

RIGHT-OF-WAY TO
PENNSYLVANIA AVENUE

N 37,750
E 4,600

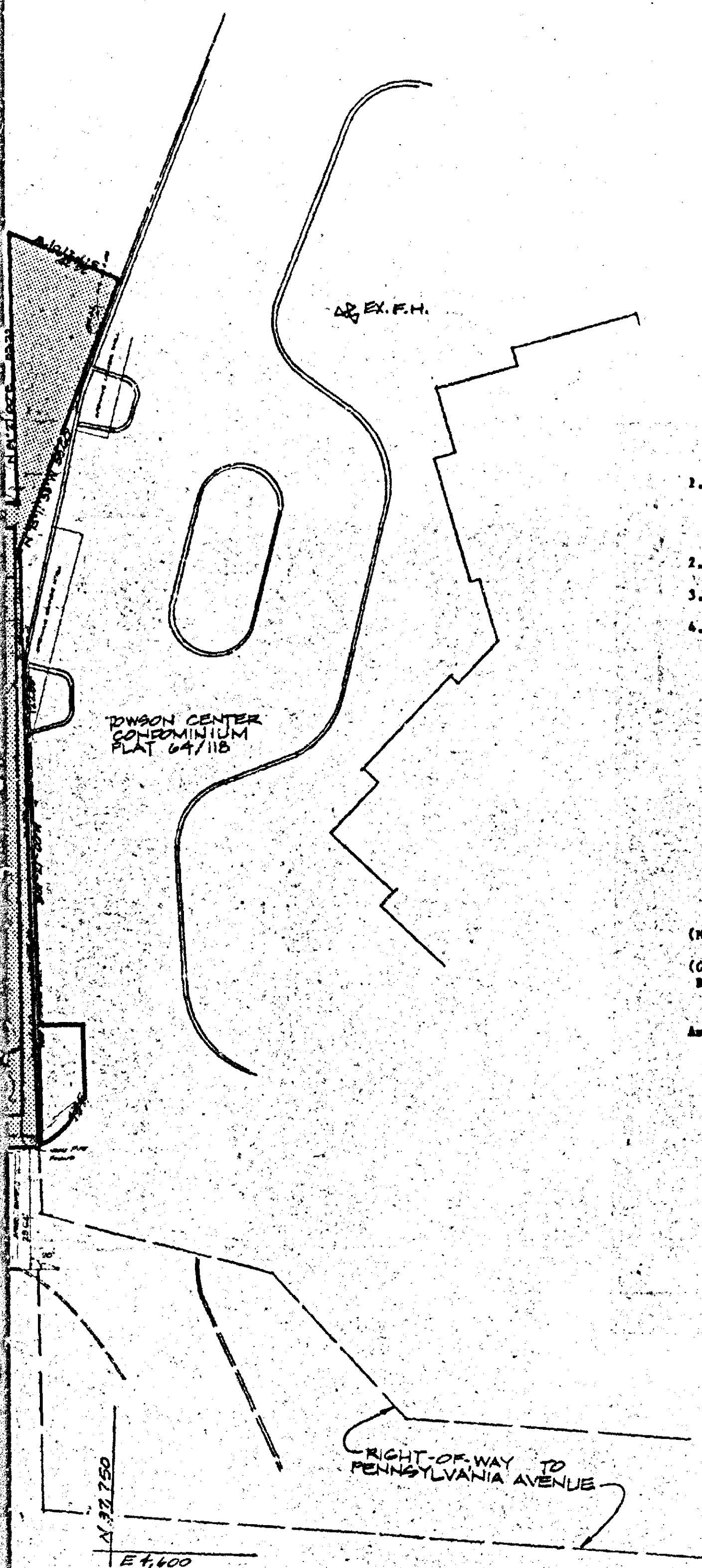


NORTH ELEVATION / JOPPA ROAD



WEST ELEVATION / PUBLIC R.O.W.





General Notes

- 203 East Joint Venture
115 East Joppa Road
Towson, Maryland 21204
(301) 828-1800
- Election District 9; Councilmanic District 4; Census Tract 4909.
- Watershed 23, Subwatershed 55.
- Current Zoning: The site and all adjacent properties are zoned BM-CT.

Site Acreage:

Gross = 0.942 Acres +/- = 41,043 S.F.
(Including 30 feet of Joppa Road
right-of-way along frontage.)
Net = 0.849 Acres +/- = 36,975 S.F. +/-

Floor Area Ratio:

Allowed = 5.5
Proposed = $\frac{225,700}{41,043 \text{ S.F.}} = 5.49$

Mechanical Penthouse	=	4,543 S.F.
16th - 18th Floors @ 7,619 S.F./Floor	=	22,857 S.F.
13th - 15th Floors @ 9,564 S.F./Floor	=	28,692 S.F.
11th - 12th Floors @ 11,449 S.F./Floor	=	22,898 S.F.
5th - 10th Floors @ 13,334 S.F./Floor	=	80,004 S.F.
4th Floor @ 11,611 S.F./Floor	=	11,611 S.F.
(Mezzanine) 3rd Floor @ 11,478 S.F./Floor	=	11,478 S.F.
(Plaza) 2nd Floor @ 24,817 S.F./Floor	=	24,817 S.F.
(Grade Level) Restaurant 1st Floor @ 18,800 S.F./Floor	=	18,800 S.F.
Total	=	225,700 S.F.

Amenity Open Space: Required = $0.1 \times 225,700 = 22,570 \text{ S.F.}$
Provided = 23,641 S.F.

Parking:

Required = 24,817 S.F. Office @ 1/300 = 82.72
177,540 S.F. Office @ 1/500 = $\frac{355.08}{437.80}$

Proposed = Grade Level @ 8 Cars
Below Grade Level 1 @ 91 Cars
Below Grade Level 2 @ 91 Cars
Below Grade Level 3 @ 91 Cars
Below Grade Level 4 @ 91 Cars
Below Grade Level 5 @ 24 Cars
Total 466 Cars

9 Handicapped parking spaces are required and will be provided.

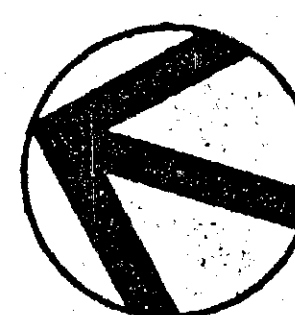
- There are no existing or proposed well or septic areas on the site.
- Soils on the site are Glencol (G13), with only slight restrictions for structures and moderate restrictions on streets and parking due to slopes.
- Existing vegetation will be removed. Street trees will be installed as shown on the plans.
- There are no slopes greater than 25%. There are no streams, bodies of water, springs or flood plains on the site.
- The existing building is not historically significant and will be demolished.
- Current Ownership: Mr. George B. Stump
204 East Joppa Road
Towson, MD 21204
Deed Reference: 5813/223;5712-0407
Property No.: 17-00-013903;17-00-009907
- Estimated Average Daily Trips:
202,357 S.F. Office @ 12.3 A.D.T.'s / 1,000 S.F. = 2,488.99 A.D.T.'s
- Site lighting will comply with applicable Baltimore County standards.
- New impervious area will be less than one-half acre, therefore the site is exempt from stormwater management requirements under Section 3.1(5) of the Stormwater Management Policy and Design Manual adopted January 17, 1984. A waiver has been sought.
- There are no wetlands, critical areas, archeological sites, endangered species or hazardous materials on the site.
- Only very minor grading will be required in order to tie into existing grades at property lines.
- The maximum average building height allowed in BM-CT is 1-1/2 times the maximum average height otherwise permitted in BM Zones. The building has been setback to comply with all height test restrictions.
- Variances have been sought to reduce the front setback from 15' to 0' for underground parking.
- Planting has been shown schematically. A planting plan as per the Landscape Manual will be provided prior to building permits.

PETITIONER'S
EXHIBIT 2



DAFT • McCUNE • WALKER INC.
LAND PLANNING CONSULTANTS
LANDSCAPE ARCHITECTS
ENGINEERS
530 E. JOPPA ROAD
TOWSON, MD. 21204
TELEPHONE: (301) 296-3333

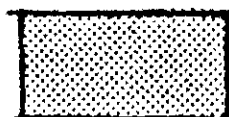
JADCO OFFICE BUILDING



SCALE:
1" = 20'
JOB ORDER NO.
83099-A
ISSUE DATE
June 25, 1984

DATE	REVISIONS
6-28-84	NOTES, EDITION 2, A.D.T.

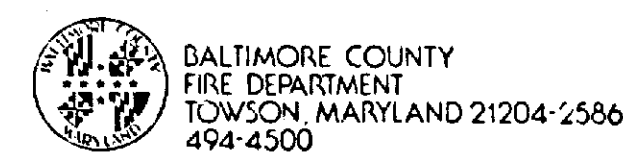
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of
1



AMENITY OPEN SPACE

Pursuant to the advertisement, posting of property, and public hearing on the Petition and it appearing that strict compliance with the Baltimore County Zoning Regulations would/would not result in practical difficulty and unreasonable hardship upon the Petitioner(s) and the granting of the variance(s) requested will/will not adversely affect the health, safety, and general welfare of the community, the variance(s) should/should not be granted.

Therefore, IT IS ORDERED by the Zoning Commissioner of Baltimore County, this _____ day of _____, 19____, that the herein Petition for Variance(s) to permit



PAUL H. REINCKE
CHIEF

July 20, 1984

Mr. William Hammond
Zoning Commissioner
Office of Planning and Zoning
Baltimore County Office Building
Towson, Maryland 21204

Attention: Nick Commodari, Chairman
Zoning Plans Advisory Committee

RE: Property Owner: George B. Stumpp

Location: S/S E. Joppa Road 2 '12' E. of Virginia Avenue

Item No.: 14 Zoning Agenda: Meeting of 7/24/84

Certification:

Pursuant to your request, the referenced property has been surveyed by this Bureau and the comments below marked with an "X" are applicable and required to be corrected or incorporated into the final plans for the property.

() 1. Fire hydrants for the referenced property are required and shall be located at intervals of _____ feet along an approved road in accordance with Baltimore County Standards as published by the Department of Public Works.

() 2. A second means of vehicle access is required for the site.

() 3. The vehicle dead end condition shown at _____

EXCEEDS the maximum allowed by the Fire Department.

() 4. The site shall be made to comply with all applicable parts of the Fire Prevention Code prior to occupancy or beginning of operation.

() 5. The buildings and structures existing or proposed on the site shall comply with all applicable requirements of the National Fire Protection Association Standard No. 101 "Life Safety Code", 1976 Edition prior to occupancy.

() 6. Site plans are approved, as drawn.

() 7. The Fire Prevention Bureau has no comments at this time.

REVIEWED BY: *George M. Hagan* Noted and Approved: *George M. Hagan*
Planning Group Fire Prevention Bureau
Special Inspection Division

/mb * CRG - USE CRG COMMENTS IF REQUIRED.

ORDER RECEIVED FOR FILING
DATE *Oct 18, 1984*
BY *John B. [illegible]*

IN RE: PETITION ZONING VARIANCES
S/S of Joppa Road, 281.12' E
of Virginia Avenue (203 East
Joppa Road) - 9th Election
District
George B. Stumpp, Petitioner
BEFORE THE
ZONING COMMISSIONER
OF BALTIMORE COUNTY
Case No. 85-99-A

FINDINGS OF FACT AND CONCLUSIONS OF LAW

The Petitioner herein requests a variance to permit a front yard setback of zero feet instead of the required 15 feet and a setback of 35 feet from the centerline of Joppa Road instead of the required 40 feet in order to construct an underground parking garage, as more particularly shown on Petitioner's Exhibit 2.

The Petitioner appeared and testified. Also appearing on behalf of the Petitioner were Richard Swernew, a joint owner in the joint venture constructing the proposed 18-story office building on this site; Edmund F. Haile, a registered professional engineer; George E. Gavrellis, an expert planner; and Charles Brylla, a registered professional engineer and the project manager for the proposed site. Appearing as Protestants were Alex J. Soled, an attorney and resident of the Ridgely Condominium building, and Margaret Skidmore, a neighbor. A. Rohana, a member of the Board of Directors of the Ridgely Condominium Association, appeared, not as a Protestant but to acquiesce to the proposed building. Leslie Graef, Executive Director of the Towson Development Corporation, appeared to testify that his organization was in favor of the proposed use and Robert L. Hannon, Director of the County Economic Development Commission, sent a letter supporting the proposed use. See Petitioner's Exhibit 1. Testimony indicated that the subject property, zoned B.M.-C.T., located on Joppa Road in Towson, was approved for an 18-story office building by the County

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DATE *Oct 18, 1984*
BY *John B. [illegible]*

Review Group (CRG) on July 18, 1984. All Baltimore County Zoning Regulations (BCZR) have been complied with except that the requested variances are necessary. In designing the building, the developer determined that it was in the best interest of the proposed condominium building, the Towson Town Center, the County Master Plan, and the residents of nearby properties to locate the necessary parking underground. Based on its size, the proposed building requires 438 spaces, and if underground, the developer will provide five levels of parking below grade to satisfy this requirement. In fact, there will be nine more spaces than required. In order to limit the depth necessary to provide the parking described, the Petitioner proposes to construct the parking levels up to the property line as perceived below grade, which would run down from grade parallel to the described property lines found in the Land Records of Baltimore County. The presumption has been made that the B.M. setback standards as established at grade or above grade shall equally apply to below grade.

The Petitioner argued that it would be a practical difficulty to do anything other than what is proposed. If the variances were denied, another level would be needed, requiring the removal of another 300,000 cubic feet of hard and difficult rock. This could be accomplished only by further blasting and would add at least a month or two to the overall schedule for completion of the project. In fact, if the variances were denied, the Petitioner could go deeper and would. The failure to grant the variances would in no way impact on the size of the building, which has already been approved by the CRG. There would be no reduction in size, only more blasting and inconvenience to residents of the area and to the developer.

Mr. Soled argued that the Petitioner failed to meet the burden of proof under Section 307, BCZR, and therefore, the variances should not be granted. He further argued that traffic will be adversely impacted and that disruption to

- 2 -

the quiet enjoyment of his property will occur if granted. Mr. Soled also noted the potential pollution problem caused by over 400 cars underground.

Ms. Skidmore, who has lived in her single-family home for 46 years, resides next door to the instant property. She argued that it will add pollution and invade her rights to air and light and that it will be only six feet from her property line.

Mr. Haile and Mr. Gavrellis testified that, in their opinion, the proposed variances would be within the spirit and intent of the BCZR and that there would be no adverse impact on the health, safety, and welfare of the community. Further, they believe a practical difficulty would exist if the variances were denied. They both emphasized that the variances to the setbacks are below ground, where they are unseen, unheard, and never felt. Mr. Gavrellis stated that the purpose of setbacks is for the protection of neighbors' enjoyment of light and air and enjoyment of their property without encroachment. He argued that neither are impacted by the requested variances in any way. Mr. Haile stated that the CRG investigated the traffic situation which would impact on the area's roads and, with certain modifications as noted on the site plan, approved the planned project.

The Petitioner seeks relief from Section 235.1, pursuant to Section 307, BCZR. The first issue that must be resolved is whether a variance is required where the construction is to occur below ground. There may be occasions where construction underground could impact on the factors cited above. A review of the objections behind the BCZR would lead a reasonable person to conclude that the setback requirements should be strictly construed both above and below grade.

In this case, however, based on the specific facts presented, the requested setbacks would in no way impact on the quiet enjoyment of others' properties or

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DATE *Oct 18, 1984*
BY *John B. [illegible]*

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in their enjoyment of light and air. The purpose of this hearing is not to review the CRG decision, which was not appealed, but to be limited in scope to the specific variances requested. There was no expert testimony to contradict that presented by the Petitioner. The opinions or conclusions of witnesses must be measured by the soundness of their underlying reasons or facts. *Surkovich v. Doub*, 265 A.2d 447 (1970). The explanations provided by the Petitioner's witnesses as a basis for their opinion are both substantial and strong. See *Coppolino v. County Bd. of Appeals of Balto. Co.*, 328 A.2d 55 (1974).

An area variance may be granted where strict application of the zoning regulation would cause practical difficulty to the petitioner and his property. *McLean v. Soley*, 270 Md. 208 (1973). To prove practical difficulty for an area variance, the petitioner must meet the following:

- whether strict compliance with requirement would unreasonably prevent the use of the property for a permitted purpose or render conformance unnecessarily burdensome;
- whether the grant would do substantial injustice to applicant as well as other property owners in the district or whether a lesser relaxation than that applied for would give substantial relief; and
- whether relief can be granted in such fashion that the spirit of the ordinance will be observed and public safety and welfare secured.

Anderson v. Bd. of Appeals, Town of Chesapeake Beach, 22 Md. App. 28 (1974).

It is clear from the testimony that if the variances were granted, such use as proposed would not be contrary to the spirit of the BCZR and would not result in substantial detriment to the public good.

After due consideration of the testimony and evidence presented, it is clear that a practical difficulty or unreasonable hardship would result if the instant variances were not granted. It has been established that the requirement the Petitioner seeks relief from here would unduly restrict the use of the due to the special conditions unique to this particular parcel. In

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DATE *Oct 18, 1984*
BY *John B. [illegible]*

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addition, the variances requested will not be detrimental to the public health, safety, and general welfare.

Pursuant to the advertisement, posting of the property, and public hearing on this Petition held, and for the reasons given above, the variances requested should be granted.

Therefore, IT IS ORDERED by the Zoning Commissioner of Baltimore County, this 22nd day of October, 1984, that the Petition for Zoning Variances to permit a front yard setback of zero feet instead of the required 15 feet and a setback of 35 feet from the centerline of Joppa Road instead of the required 40 feet be and is hereby GRANTED, from and after the date of this Order, subject, however, to the following restrictions:

- The Petitioner may apply for his building permit and be granted same upon receipt of this Order; however, Petitioner is hereby made aware that proceeding at this time is at his own risk until such time as the applicable appellate process from this Order has expired. If, for whatever reason, this Order is reversed, the Petitioner would be required to return, and be responsible for returning, said property to its original condition.
- Compliance with the CRG approved plan.

George L. Gavrellis
Zoning Commissioner of
Baltimore County

ORDER RECEIVED FOR FILING
DATE *Oct 18, 1984*
BY *John B. [illegible]*

cc: Mr. George L. Gavrellis
Mr. Ernest A. Rohana
Alex J. Soled, Esquire
People's Counsel

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BALTIMORE COUNTY, MARYLAND

INTER-OFFICE CORRESPONDENCE

Arnold Jablon
TO: Zoning Commissioner
Date: September 24, 1984
Norman E. Gerber, Director
FROM: Office of Planning and Zoning
George B. Stumpp
SUBJECT: 85-99-A

A plan was approved by the County Review Group on July 18, 1984.

Norman E. Gerber
Norman E. Gerber, Director
Office of Planning and Zoning

NEG/JGH/sf

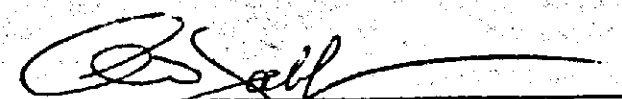
MAY 14 1985

85-99-A


BALTIMORE COUNTY OFFICE OF PLANNING & ZONING

County Office Building
111 W. Chesapeake Avenue
Towson, Maryland 21204

Your petition has been received and accepted for filing this
12th day of September, 1984.


ARNOLD JABLON
Zoning Commissioner

Petitioner George B. Stumpp
Petitioner's
Attorney

Received by 
Nicholas B. Commodari
Chairman, Zoning Plans
Advisory Committee

CERTIFICATE OF POSTING
ZONING DEPARTMENT OF BALTIMORE COUNTY
Towson, Maryland

85-99A

District 9th Date of Posting 10-1-84
Posted for: Variances
Petitioner: George B. Stumpp
Location of property: 515 of Joppa Rd 281.12' E of Virginia Ave.
203 E. Joppa Rd.
Location of Signs: front of Property
Remarks: _____
Posted by G. Freund Date of return: 10-1-84
Number of Signs: 1

CERTIFICATE OF PUBLICATION

TOWSON, MD., September 27, 1984

THIS IS TO CERTIFY, that the annexed advertisement was
published in THE JEFFERSONIAN, a weekly newspaper printed
and published in Towson, Baltimore County, Md., appearing on
September 27, 1984.

THE JEFFERSONIAN,


Publisher

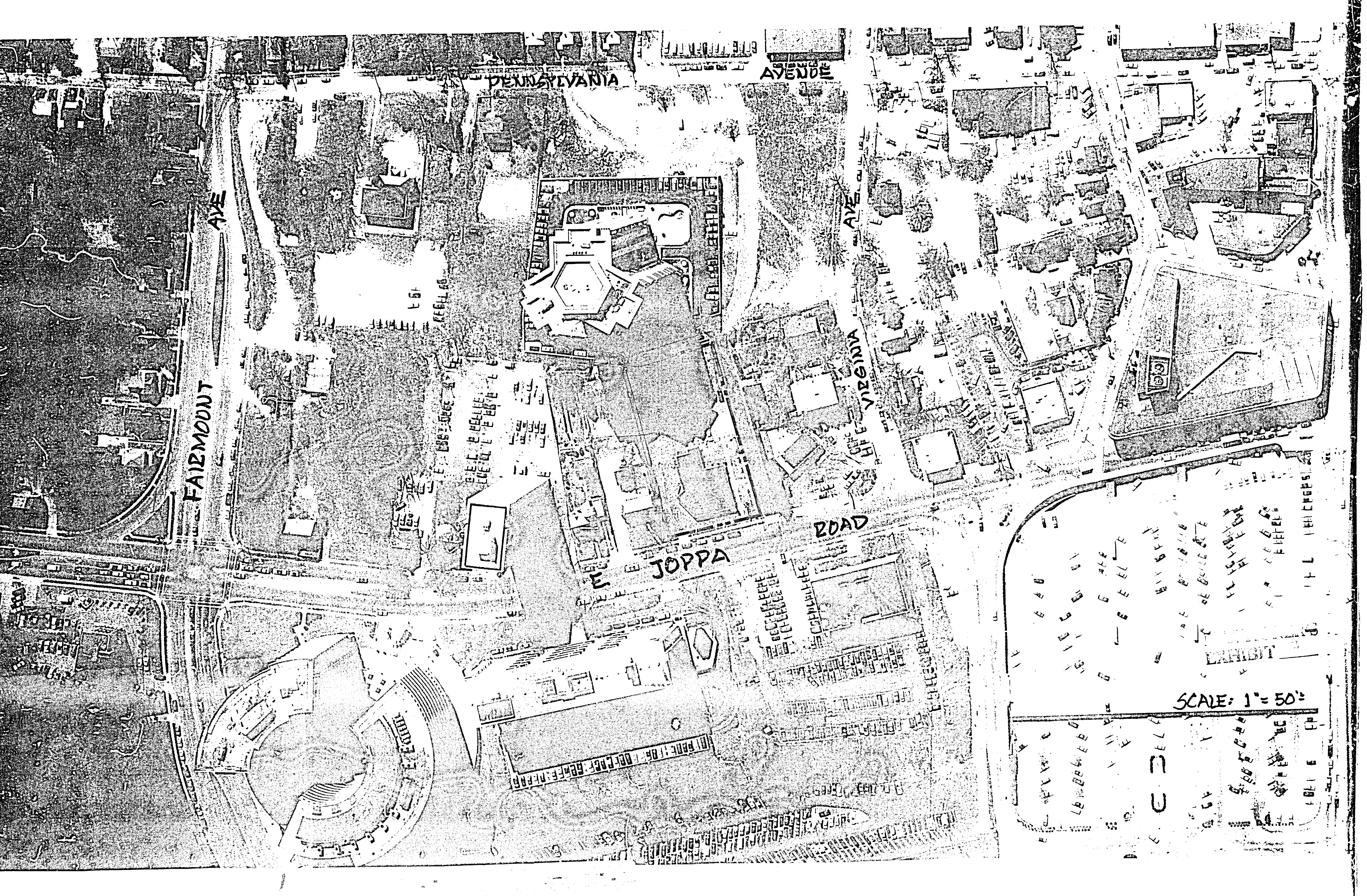
Cost of Advertising 18⁰⁰

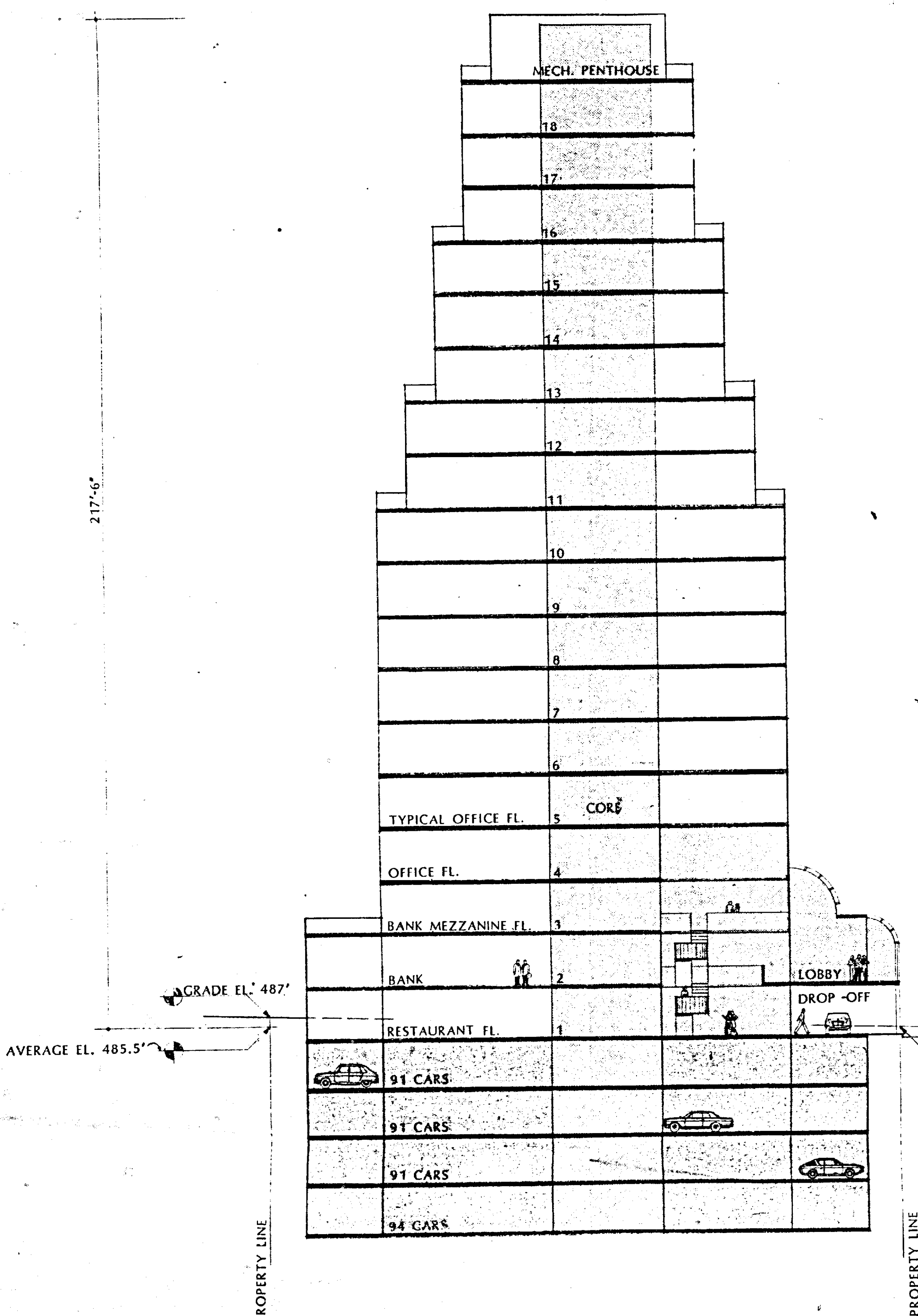
85-99-A

PETITION FOR VARIANCES
9th Election District

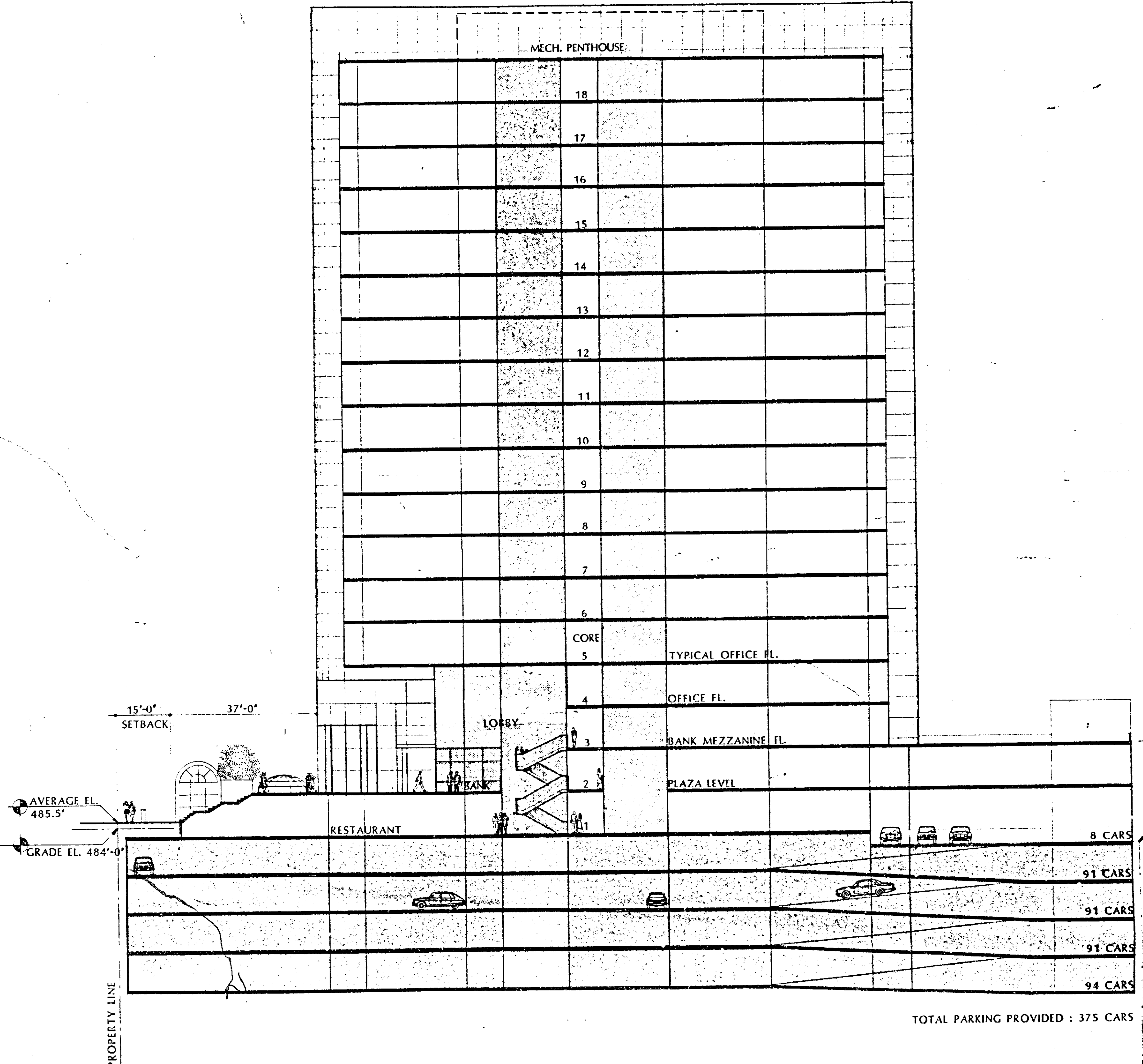
LOCATION: South side of Joppa Road, 281.12 feet East of Virginia Avenue (203 East Joppa Road)
DATE AND TIME: Monday, October 18, 1984 at 10:45 a.m.
PUBLIC HEARING: Room 104, County Office Building, 111 W. Chesapeake Avenue, Towson, Maryland

The Zoning Commissioner of Baltimore County, by authority of the Zoning Act and Regulations of Baltimore County, will hold a public hearing: Petition for Variances to permit a 0 foot front setback in lieu of the required 15 feet and a 35 foot setback from the centerline of Joppa Road in lieu of the required 40 feet. Being the property of George B. Stumpp as shown on the plat filed with the Zoning Office. In the event that this Petition is granted, a building permit may be issued within the thirty (30) day appeal period. The Zoning Commissioner will, however, entertain any request for a stay of the issuance of said permit during this period for good cause shown. Such request must be received in writing by the date of the hearing set above or made at the hearing.
By Order Of
ARNOLD JABLON,
Zoning Commissioner
of Baltimore County
Sept. 27, 1984





CROSS SECTION / JOPPA ROAD

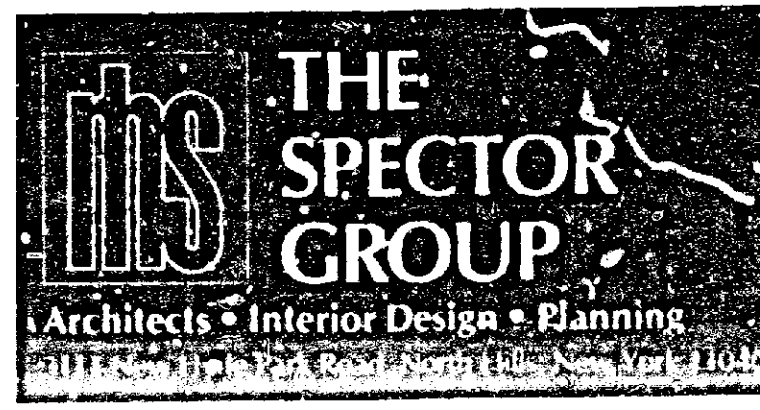


LONGITUDINAL SECTION / PUBLIC R.O.W.

TOTAL PARKING PROVIDED : 375 CARS

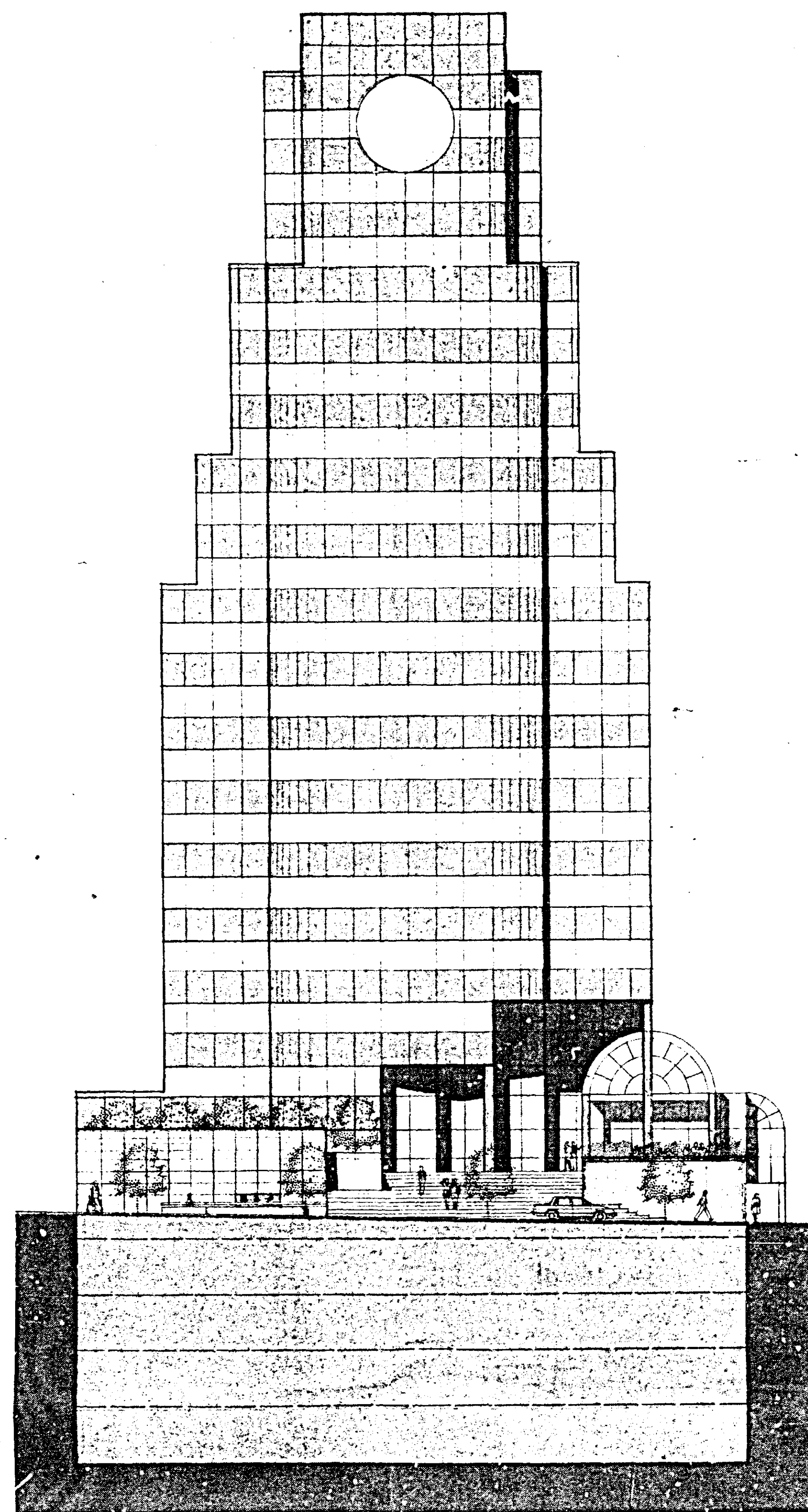
PROPOSED OFFICE BUILDING TOWSON, MARYLAND

BUILDING SECTIONS
SCALE: 1/16" = 1'-0"

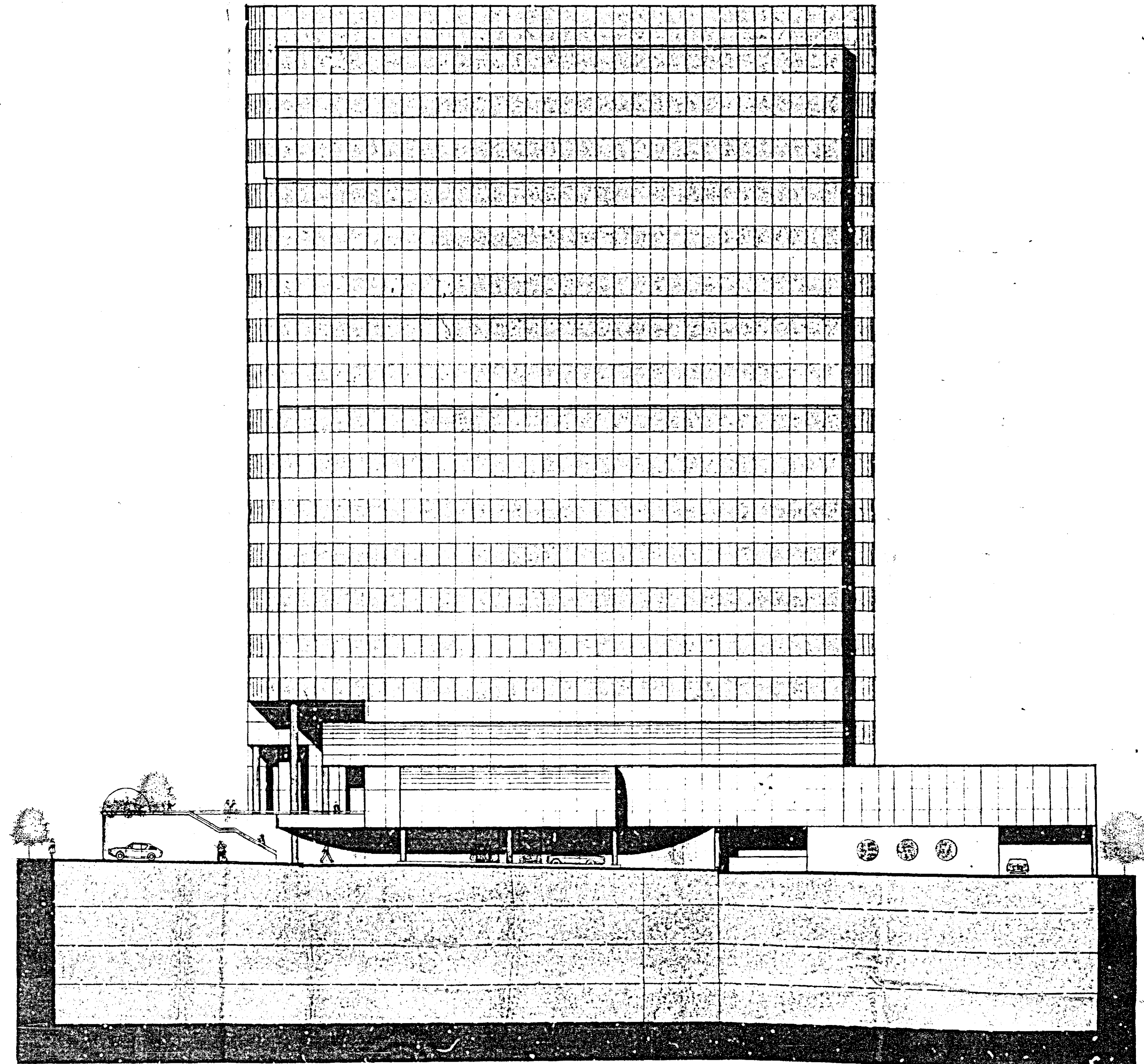


SCHEMATIC SK-5

PETITIONER'S EXHIBIT



NORTH ELEVATION / JOPPA ROAD



WEST ELEVATION / PUBLIC R.O.W.

PROPOSED OFFICE BUILDING TOWSON, MARYLAND

BUILDING ELEVATIONS

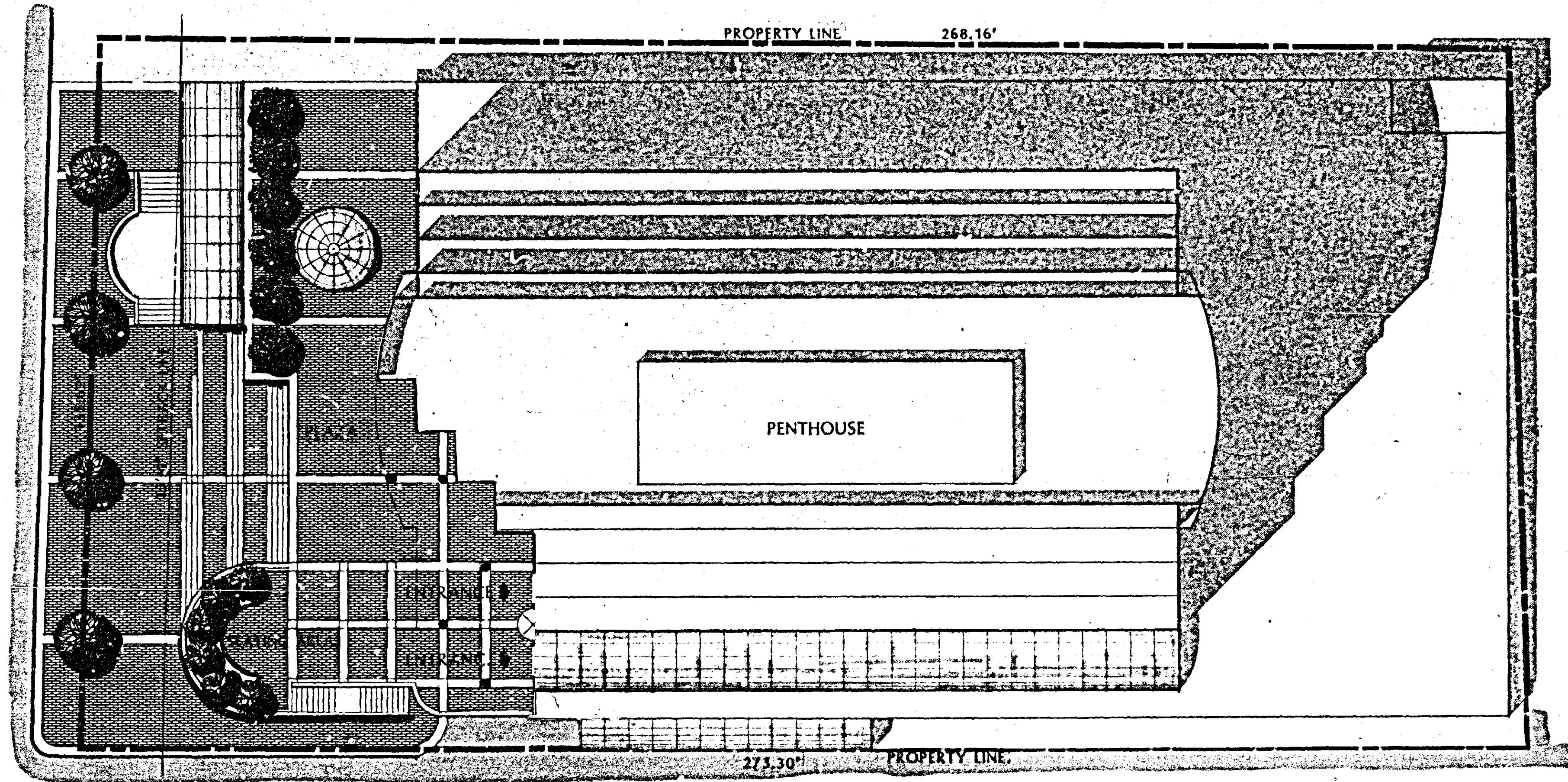
SCALE: 1/16" = 1'-0"
0 5 10 20 35 50 FT.

THE SPECTOR GROUP
Architects • Interior Design • Planning
711 New Hyde Park Road, North Hills, New York 11040

SCHEMATIC
SK-4

PETITIONER'S
EXHIBIT 4

EAST JOPPA ROAD



PLAZA LEVEL / 2ND FLOOR - BANK & OFFICE SPACE
24,817 SQ. FT.

PETITIONER'S
EXHIBIT 6

